

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

RICHARD HORTON,

*Plaintiff,*

V.

CITY OF COLUMBUS, Columbus Division  
of Police Officers BRENDA K. WALKER  
(Badge #1176), MIEKO SIAS as personal  
representative of the ESTATE OF SAM SIAS  
(Badge #1871), and AS-YET UNKNOWN  
COLUMBUS POLICE OFFICERS,

*Defendants.*

Case No. 23-cv-3888

Chief Judge Algenon L. Marbley

Magistrate Judge Elizabeth P. Deavers

## JURY TRIAL DEMANDED

**PLAINTIFF’S MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO RESPOND TO DEFENDANTS’ MOTION TO COMPEL**

Plaintiff, RICHARD HORTON, by and through his attorneys, respectfully moves for an extension of time for Plaintiff to file a response to Defendants' Motion to Compel (Dkt. 64), up to and including April 24, 2025. In support, Plaintiff states as follows:

1. Defendants City of Columbus and Brenda Walker filed their Motion to Compel on March 20, 2025. Dkt. 64.
2. Pursuant to Local Rule 7.2(a)(2), Plaintiff's response is due on April 10, 2025.
3. Plaintiff's counsel has been working diligently to meet the deadline. However, due to Plaintiff's counsel being out on medical leave for a portion of that time and other professional commitments, Plaintiff requires a brief extension of time to file his response.
4. Prior to filing this motion, and pursuant to Local Rule 7.3(a), Plaintiff's counsel conferred with Defendants for the relief requested herein, and Defendants do not oppose the extension.

5. This motion is not made in bad faith or for the purpose of delay, and it will not unduly prejudice any of the parties. Further, the extension will allow for Plaintiff to confer with the new counsel for the Ohio Innocence Project to streamline the briefing and promote judicial economy. *See* Dkt. 68.

6. For these reasons, Plaintiff respectfully requests that this Court grant a 14-day extension of time to file his responsive brief.

WHEREFORE Plaintiff respectfully requests this Honorable Court grant his Unopposed Motion for Extension of Time to Respond to Defendants' Motion to Compel, up to and including April 24, 2025, and any other relief this Court deems just.

RESPECTFULLY SUBMITTED,

**RICHARD HORTON**

/s/ Michele Berry  
*One of Plaintiff's Attorneys*

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**CERTIFICATE OF SERVICE**

I, Alyssa Martinez, an attorney, certify that a copy of the foregoing was filed electronically on April 10, 2025 using the Court's CM/ECF System, and that notice of this filing was sent that same day to the other parties to this case by operation of the Court's CM/ECF System.

/s/ Alyssa Martinez  
*One of Plaintiff's Attorneys*